

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ANDREW LECHTER, et. al.	)	
	)	
Vs	)	CIVIL ACTION:
	)	1:20-CV-01325-AT
APRIO, LLP f/k/a Habib Arogeti	)	
And Wynne, LLP, et. al.	)	

**MOTION TO DISMISS**

Pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6), defendants Nancy Zak and Forever Forests, LLC hereby move to dismiss all counts in plaintiff's Complaint for permanent injunction that relate to her. Ms. Zak and Forever Forests, LLC jointly and severally respectfully request dismissal for the reasons set forth in the contemporaneously filed Memorandum of Law in Support of Motion to Dismiss.<sup>1</sup>

Given the complexity of the legal issues raised in the memorandum of law in support of this motion, we respectfully request oral argument.

This the 7<sup>th</sup> day of August, 2020.

Respectfully submitted,

/S/ S. Fenn Little, Jr.  
S. Fenn Little, Jr.  
GA Bar Number: 454360

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<sup>1</sup> In the interest of judicial economy and given relationship between Ms. Zak and Forever Forests, LLC this motion and the Memorandum are consolidated for motion and argument purposes.

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing document was formatted in Times New Roman 14 pt., in accordance with Local Rule 5.1C, and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

This 7<sup>th</sup> day of August, 2020.

Respectfully submitted,

/s/ S. Fenn Little, Jr.

S. Fenn Little, Jr.

GA Bar Number: 454360

Attorney for Nancy Zak

And Forever Forests, LLC

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